



February 28, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: Abbott Laboratories v. Carol Feinberg, Case No. 18 Civ. 8468 (LGS)

Dear Judge Schofield,

We write on behalf of Plaintiff Abbott Laboratories (“Abbott”) under Section I.D.3 of the Court’s Individual Rules and Procedures for Civil Cases to respectfully request the Court’s permission to file Exhibits 1, 2, and 5 to the February 28, 2020, Declaration of Judd B. Grossman, Esq. (the “Grossman Declaration”) in opposition to Defendants’ choice-of-law motion (Dkt. 97) in redacted form and under seal. These redactions are narrowly tailored to maintain confidentiality of the following limited categories of information: (1) the identity of various artworks; and (2) personal contact information of non-party witnesses.

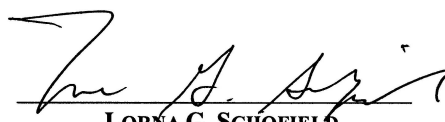
The parties agreed at the outset of this case—consistent with the practice in many high-end-art disputes—to redact the identity of the artist and the title and description of the Painting at issue to avoid further casting a cloud on its title. This Court previously allowed such redactions that were “narrowly tailored and necessary to prevent the disclosure of information that could unnecessarily impair the value of the artwork.” (August 28, 2019, Order, Dkt. No. 72; see August 21, 2019, Order, Dkt. No. 70; May 13, 2019, Order, Dkt. No. 46.) For these same reasons, Abbott again seeks permission to redact the identity of the Painting, as well as several other artworks. Abbott also seeks to redact the home addresses of two non-party witnesses, where this personal information is not relevant to the claims or defenses at issue.

For these reasons, Abbott respectfully requests that the Court permit Abbott to file Exhibits 1, 2, and 5 to the Grossman Declaration in redacted form and under seal.

APPLICATION GRANTED.

Plaintiff may file Exhibits 1, 2, and 5 to the Grossman Declaration in opposition to Defendants' choice-of-law motion in redacted form and under seal. The Court has reviewed the materials, and the proposed redactions are narrowly tailored to prevent the disclosure of information that could unnecessarily impair the value of the artwork, and to prevent the disclosure of private information irrelevant to the claims or defenses at issue. See e.g., *CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 3:14 Civ. 1897, 2017 WL 4750701, at *4 (D. Conn. July 12, 2017) (allowing for redactions of "commercially sensitive" information).

Dated: March 2, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE